



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

TF  
F. #2013R01046

*271 Cadman Plaza East  
Brooklyn, New York 11201*

June 13, 2016

By FedEx and ECF

Steve Zissou, Esq.  
42-40 Bell Boulevard, Suite 302  
Bayside, NY 11361

Re: United States v. Ahmad Sheikhzadeh  
Criminal Docket No. 15-182 (S-1) (PKC)

Dear Mr. Zissou:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This letter is accompanied by a log detailing the production.

This production is comprised of one DVD labeled AS-B, containing the following:

- Documents seized pursuant to Search Warrant on March 3, 2016 (AS1505-3497)
- iPhone files seized pursuant to Search Warrant on March 3, 2016 (AS3498)

This production is also comprised of one hard drive labeled AS-C (assigned Bates number AS3499), containing images of data stored on various electronic devices seized on March 3, 2016, as detailed in the accompanying log. The devices remain in the possession of the Government, with the exception of the Sony laptop, which was previously returned to your client. The Government also remains in possession of a Microsoft Surface tablet seized on the same date.

Finally, the log further lists physical evidence seized on March 3, 2016 but not produced.

You may examine the physical evidence discoverable under Rule 16, including original documents, by calling us to arrange a mutually convenient time. This disclosure supplements the government's prior disclosure of March 28, 2016. The government also renews its request for reciprocal discovery from the defendant.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

ROBERT L. CAPERS  
United States Attorney

By: /s/ Tali Farhadian  
Tali Farhadian  
Peter Baldwin  
Assistant U.S. Attorneys  
(718) 254-6290/6236

Enclosures

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)